

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-50 through 54]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

June 22, 2012

Respectfully submitted,

N20121H50

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-50 Please refer to your response to Interrogatory DBP/USPS-24 subparts [b] through [d].

[a] Is it possible to even provide an approximate number of facilities that fall into those categories?

[b] Please provide the number of carrier routes that fall into each of the three categories.

DBP/USPS-51 Please refer to your response to Interrogatory DBP/USPS-24 subparts [e] through [j].

[a] Your response indicates that this condition, namely carriers return to their office too late to have the mail dispatched on the same day that it was collected from a customer, is primarily temporary in nature. On what do you base that belief?

[b] Please advise the extent to which this condition is not temporary in nature but is a function of the normal return to the office by the carrier compared to the time of the final dispatch to the processing center.

DBP/USPS-52 Please refer to your response to Interrogatory DBP/USPS-45.

[a] Please confirm that your response will not be correct for the implementation of phase one on July 1st.

[b] Please respond to the interrogatory for the conditions that will exist effective on July's implementation of phase one.

DBP/USPS-53 Please refer to your response to Interrogatory DBP/USPS-48.

Please explain why there must be a postal document purporting to reflect the statement of such a belief before the Postal Service can respond to my original interrogatory.

DBP/USPS-54 Please refer to your response to Interrogatory DBP/USPS-49.

Please confirm, or explain, that the present requirement for a weekday collection at a city delivery office of 5 PM or later will not change for any of the existing requirements for such a collection.